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Attorneys for Third-Party Defendant Ocean Network Express Pte. Ltd.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE COMPLAINT OF

Hapag-Lloyd Aktiengesellschaft a/k/a Hapag-
Lloyd AG

Petitioner,

AS OWNERS AND OPERATORS OF THE
M/V YANTIAN EXPRESS.

19 Civ. 5731 (GHW) (RWL)

NOTICE OF MOTION

Third-Party Defendant, Ocean Network Express Pte. Ltd. (“ONE”) by its attorneys, Lyons & Flood, LLP, moves before the Honorable Robert W. Lehrburger, United States Magistrate Judge, for an order dismissing, on the basis of the subject Singapore forum selection clause, the claims identified in the Court's memo-endorsed order of August 21, 2020 (ECF 533), and for such other and further relief as the Court may deem just and proper.

This motion is supported by the accompanying memorandum of law and declarations of Douglas Wyatt, Bernard Yee Weng Wai, and the undersigned.

Dated: September 21, 2020

LYONS & FLOOD, LLP
Attorneys for Third-Party Defendant
Ocean Network Express Pte. Ltd.

s/ Randolph Donatelli
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